

**From:** publicaccess@lichfielddc.gov.uk  
**Sent:** 01 August 2021 20:50  
**To:** jwalton467@btinternet.com  
**Subject:** Comments for Planning Application 20/00359/FULM

Mr John Edward Walton,

You have been sent this email because you or somebody else has submitted a comment on a Planning Application to your local authority using your email address. A summary of your comments is provided below.

Comments were submitted at 8:49 PM on 01 Aug 2021 from Mr John Edward Walton.

### **Application Summary**

**Address:** Land North Of Dark Lane Alrewas Burton Upon Trent  
Staffordshire

**Proposal:** Variation of conditions 2 (Approved Plans), 6  
(Drainage) and 13 (Landscaping) of permission  
18/01491/FULM relating to plot substitution of 52 of  
the approved 121 dwellings, updated landscaping and  
drainage schemes

**Case Officer:** Karen Tate  
[Click for further information](#)

### **Customer Details**

**Name:** Mr John Edward Walton  
**Email:** jwalton467@btinternet.com  
**Address:** 56 Park Road, Alrewas, Burton Upon Trent,  
Staffordshire DE13 7AJ

### **Comments Details**

**Commenter Type:** Member of public

**Stance:** Customer objects to the Planning Application

**Reasons for comment:**

**Comments:** I refer to the Objection by the Alrewas Parish Council titled "Consolidation of the concerns of the Alrewas Villagers: Part A - Flood Risk Assessment & Drainage Strategy Part B - Biodiversity and Boundary Treatment, Dated: 30 June 2021" posted on the LDC portal on 01 July 2021 under the Description "Alrewas peer review of drainage proposal". I also refer to the Simpson Associates' Response titled "P18-336 Dark Lane, Alrewas Planning Application Ref:20/00359/FULM, Dated 14 July 2021" posted on the LDC portal on 27 July 2021 (but dated 19 July 2021 on the LDC portal.)

I object on three accounts:

Firstly, the Simpson Associates' Response only addresses parts of the APC Objection.

Secondly, I consider the Simpson Associates' Response to be in need of additional explanations, as set out below.

Thirdly, has Crest Nicholson agreed to implement the recommendations of the Simpson Associates' Response?

#### Atkins FRA&DS

I consider the Atkins FRA&DS to have the following key deficiencies:

1) Ian Farmer Associates carried out four Trial Holes on 24 July 2013, the day after a three-week prolonged dry spell, and did not encounter groundwater in the Trial Holes. Consequently, the FRA&DS discarded the risk of flooding from groundwater and the impact that it would have on Surface Water Sewer design. These same dry Trial Holes were used to carry out Soakaway tests. The actual observed groundwater levels across the development are much higher than that reported in the Trial Holes report and as such render the impact on the SWS design and the Soakaway design to be far more significant than the FRA&DS implies.

2) The SWS was proposed to discharge into a new ditch and head north towards the River Trent. This ditch was then to connect into an existing field drainage ditch, which was to be cleared and re-graded as necessary to provide a clear drainage path to the River Trent. This was not feasible.

3) An Infiltration Basin was proposed which was not lined and hence would act as a route for groundwater to ingress into the SWS system.

4) The Atkins MicroDrainage calculations did not appear to account for the loss of capacity within the SWS system due to a) the ingress of groundwater from the Infiltration Basin and b) the SWS system storing rainwater due to the flap-valve being closed for periods when the River Trent is in flood.

5) The Atkins FRA&DS did identify that any surface water that the SWS system could not accommodate, should flow north towards the River Trent and not south towards the village.

#### Simpson FRA&DS

The Simpson FRA&DS progressed the Atkins FRA&DS but made the following significant changes:

- 1) The reduction in size of the Infiltration Basin.
- 2) The Introduction of an Infiltration Blanket.
- 3) The construction of a complete Drainage Ditch from the development boundary to the River Trent.
- 4) The introduction of additional hydro-brakes.
- 5) The resizing of some SWS runs.

Taking into account the above, I consider it to be unreasonable for Simpson to make the following statement in the above referenced response "Para 1.4 - In our professional opinion, the current scheme is compliant

with the approved Flood Risk Assessment and therefore, can be occupied safely without increasing flood risk to the surrounding area."

There are many issues that require resolution before the Village can be satisfied that the development will not have a negative impact, a principle continually stressed by the Inspector at the Public Inquiry.

Key concerns remaining:

A) Crossing of the 900mms diameter NTS Gas Pipeline:  
This is of particular concern to the Village as it partially dictates the route that the Drainage Ditch takes to the River Trent.

There is comment but no evidence provided on the LDC portal on which to review the proposed crossing point. The general view within the Village is that the current unapproved proposed route is the cheapest option but results in the destruction of a local well used amenity/beauty spot - The Beach. For the Village to be convinced that this is the only viable option, more information would be welcomed, namely:

- a) A Trial Hole was dug on the crossing point as shown on Drawing Number P18-336:07 T6 but there is no information as to when this was carried out and what was the reduced level of the crown of the Gas Pipeline. Can this be provided?
- b) A Geophysical Survey was carried out (June 2020) but the results are not available to the public. Can a longitudinal section be provided?
- c) Why was the inverted siphon option submitted to LDC Planning Services (October 2020) when it had not been agreed by the asset owner (National Grid), who subsequently rejected the option?
- d) Can the role of Severn Trent Water be explained, as I understand it is not its normal practice to adopt ditches crossing private land?
- e) Para 3.10 states: "Following the geophysical survey and subsequent trial holes to accurately establish the level of the gas main...". Where and when were these Trial Holes dug? What were the crown levels established and was there correlation between the Trial Holes and Geophysical Survey results regarding the levels of crown of the Gas Pipeline?
- f) Can the approval by National Grid of the relaxation of the Gas Pipeline crossing be provided?
- g) With regard to the works necessary to construct the Gas Pipeline crossing, what arrangements are proposed in the Risk Assessment and Method Statement (RAMS) to address the likelihood and consequences of the hazards of the works on the public?

B) Groundwater Level:

- a) Para 3.5 states: "Further site investigation identified that ground water would be located within 1m of the base of the proposed drainage basin." Please note that during Storm Christoph in January 2021 (way below the 1 in 100 year event) groundwater was observed in the base of the Infiltration Basin and flowing into the SWS system (i.e. 52.41m AOD). In addition, the groundwater level in the constructed length of the Drainage Ditch has been

consistently observed to be that of the River Trent. Can Crest Nicholson/Simpson clarify its understanding of groundwater levels?

b) Taking this into account, it is welcomed that the Infiltration Blanket will be made redundant by disconnection from the SWS system and that the Infiltration Basin will be lined and weighted with stone to prevent heave. However, it is noted that such works are not shown on Drawing Numbers P18-336:01 C7 and P18-336:05 C10. Can these drawings be amended?

C) Sustainable Drainage Systems (SuDS):

a) As stated above, the Soakaway Tests were carried out by Ian Farmer Associates in dry Trial Holes in July 2013. Many of the soakaways proposed are below the River Trent 1 in 100 year flood level of 53.4m AOD. Have any additional Soakaway Tests been carried out during saturated ground conditions?

b) It is also noted that many of the fully perforated collector pipes are below the River Trent 1 in 100 year flood level of 53.4m AOD, e.g. outside Plot 4, the collector pipe has an Invert Level of 52.16m AOD - Please note that Storms Dennis and Ciara caused a River Trent flood level (and hence groundwater level) of 52.5m AOD. Accordingly, these collector pipes offer a pathway for groundwater ingress into the SWS system. (Please also note that the adjacent Infiltration Blanket has been identified as a pathway for groundwater to enter the SWS system and has a base level of 52.06m AOD. This is to be isolated from the SWS system but the fully perforated collector pipes will offer the same pathway.) Can this be explained?

c) What are the design lives of the Soakaways and the Collector Pipes?

D) Floodplain Compensation:

a) Is it proposed to carry out a Topographical Survey of the Flood Zones from Dark Lane to the River Trent to validate that the 917 cubic metres of floodplain compensation has been achieved?

E) SWS Storage Requirement and Provision:

a) Using Storms Ciara and Dennis as an example, the River Trent flood level was at 52.5m AOD for several weeks. For this, similar and more severe flood events the Flap-valve on the SWS outfall adjacent to SWS 17 will be closed. This will prevent water in the SWS system (rainwater and ingress from the Collector Pipes) from leaving the system until there is a hydraulic head behind the Flap-valve. Accordingly, water within the SWS system has the potential to rise to 52.5m AOD (in the Ciara/Dennis scenarios) and 53.4m AOD (in the River Trent 1 in 100 year flood event.) The MicroDrainage calculations do not appear to account for this cumulative loss of capacity within the SWS system. Accordingly, the calculation of storage requirement is considered suspect. Can this be clarified?

b) It is during such periods that the Village will be vulnerable to surface water being unable to enter the SWS system, a scenario that is exacerbated by the increased number of Hydro-brakes, the potential for Soakaways not to work as designed, and the removal of

the bund along the north side of Alrewas Footpath 51, Dark Lane. Can it be explained how this can be averted?  
c) What is the design life of the Geocellular Storage Crate Installations proposed for Plots 50 to 54?

F) The Beach:

- a) Could the approvals of the Environment Agency and Severn Trent Water relating to the SWS system outfall at The Beach be made public?
- b) If both the EA and STW have no objections to the SWS system outfall at The Beach, then presumably they will have no objections to it being located to the east, downstream of The Beach.
- c) Irrespective of where the Gas Pipeline is crossed, there is scope for the Drainage Ditch to be aligned to miss The Beach. What is the reason for destroying The Beach?



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